

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

IAN HUNTER LUCAS, Pro Se

Plaintiff(s),

v.

MARY ANN JESSEE et al.,

Defendant(s).

Case No. 3:24-cv-00440

Judge Waverly D. Crenshaw, Jr  
Magistrate Judge Jeffery S. Frenley

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The plaintiff respectfully moves this Court for  
Procedure 1404(a) due to potential prejudice and  
Procedure 1404(a) authorization to both hands to be  
might have been brought, or to any district or di  
convenience of parties and witnesses, in the inter

In this case, the plaintiff is faced with pote  
fair and impartial trial. The United States Supre  
pretrial publicity can find it difficult to be impartial j  
ven Sheppard, 384 U.S. 494 (1966) that necessitates a  
either presumed or actual, depending on the circ

Furthermore, the interest of justice supports  
several factors for a court to consider when deci  
including the convenience, of the parties to the litigation  
involved in maintaining the litigation in the cur

The plaintiff's preference for a forum is a si  
Nonetheless, other factors, such as the convenien

location of documentary evidence, and the potential forum, must also be evaluated.

The district court possesses broad discretion. The critical question is whether a fair and impartial

In conclusion, the plaintiff respectfully requests potential prejudice, and change of venue to the Western Eastern District of Tennessee.

Signed and dated this 25th day of May 2024.

Respectfully submitted,



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Ian Hunter Lucas  
*Plaintiff Pro Se*  
221 Charleston Avenue  
Pleasant View, Tennessee, 37146  
Phone: (910) 872-3577  
Email: [LucasIanHunter@outlook.com](mailto:LucasIanHunter@outlook.com)

## CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May 2024, the foregoing **NOTICE** was filed with the Court's CM/ECF system, which automatically forwarded a copy to the following counsel of record:

Mark A. Baugh, BPR No. 015779  
Denmark J. Grant, BPR No. 036808  
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C.  
1600 West End Avenue, Suite 2000  
Nashville, Tennessee 37203  
Telephone (615) 726-5600  
Facsimile (615) 744-5760  
*Attorneys for Defendants Clairise Gamez, Crystal Ritchie, and Marissa Shulruff*

Mark A. Baugh, BPR No. 015779  
(See above for Address and Contact Information)  
Attorney to be Noticed<sup>1</sup>: Daniel Diermeier, Tracey George, Cybele Raver, Melanie Lowe, Timothy Garrett, Maja A. Hartzell, Ernie Rushing, Sara Donahoe, Terry Walker, K. Melissa Smith Hayes, Nancy Wise, Lacey Cross, Monika Do, Carrie Plummer, Ellen Schoen, Judson Smith, Jessica Wellette, Melanie Morris, Robingale Panepinto, Melissa Lord, Brittany Kirby, and Shannon Ellrich

Kevin C. Klein (#23301)  
Jeffrey W. Sheehan (#33534)  
KLEIN SOLOMON MILLS, PLLC  
1322 4th Avenue North  
Nashville, Tennessee 37208  
(615) 600-4780  
*Attorneys for Defendants: Mary Ann Jessee, Michelle Tellock, Joel Newsome, Melissa Porter, G.L. Black, Neil Jamerson, Jeremy Bourgoin, Mavis Schorn, Pamela Jefferies, E. Jacob Cummings, Jill Harris, Heather Robbins, Cate Enstrom, Angela Weaver, Mary Roy, Michael Fazi, and Feylyn Lewis*

Respectfully submitted,

/s/ Ian Hunter Lucas  
Ian Hunter Lucas  
Plaintiff Pro Se  
221 Charleston Avenue  
Pleasant View, Tennessee, 37146  
Phone: (910) 872-3577  
Email: LucasIanHunter@outlook.com

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<sup>1</sup> This service has been executed through the Files (CM/ECF) system, with Attorney Mark A. Baugh BE NOTICED" on behalf of these defendants. It made notwithstanding the fact that a Federal Complaint or Federal Summons has not been formally served upon these defendants. This notice is issued to certify the completion of service as outlined above and to affirm the compliance with procedural requirements under the Federal Rules of Civil Procedure regarding the notification of defendants in this matter.